



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 14 2011

VIA FEDEX

Andrew Bastian, President
Spray Products Corp.
1323 Conshohocken Road
Plymouth Meeting, PA 19462

Re: Request for Information Pursuant to Section 3007(a) of the Resource
Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and
Management of Hazardous Waste by Spray Products Inc.
EPA ID No. PAD042716084
Reference No. C12-003

Dear Mr. Bastian:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting information to supplement the information obtained by EPA during the inspection of Spray Products Corp. located at 1323 Conshohocken Road, Plymouth Meeting, Pennsylvania (the "Facility") on August 4, 2011. A copy of the inspection report is enclosed. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes" EPA hereby requires that you furnish to EPA, **within twenty (20) calendar days of receipt of this letter**, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question or letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by

you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original, the date such original was prepared, the person(s) who prepared the original and the date the document became effective at the Facility. *Copies of all documents must be legible.*

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266, 268, and 273 shall have the meanings set forth therein.

Requested Information

1. During EPA's August 4, 2011 inspection approximately 50 containers were being stored next to the chemical storage tank farm outside, see photos #20 thru #27. According to the Spray Products Corp. these containers were brought to the Plymouth Meeting facility sometime in 2009 from the Spray Products Corp. facility located in Upland Pennsylvania, which is no longer in operation. Spray Products Corp. personnel were unable to identify the contents in each of the containers. Please answer the following;
 - a. Identify the contents and volume of material in each container at the time of the inspection.
 - b. Provide the date on which these containers first began to accumulate at the Facility. If an exact date cannot be determined, please provide an estimated time period of accumulation (month/year).
 - c. Provide a MSDS for each such material. If a MSDS is unavailable, please provide the manufacturer name and chemical name for each container.
 - d. Provide the manufacture date and lot number for each container.
 - e. Does the facility plan to use this material in any way?

- f. Please provide a detailed narrative explaining how and when (month/year) the material in each of these containers will be used by Spray Products Corp.
 - g. State “yes” or “no” was a “waste determination” and “LDR determination” made for any of the materials in these containers at the time of the inspection?
 - h. If determined to be a waste, would any of the material be a “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with each such material.
 - i. Have any of these containers been shipped off-site since the EPA August 4, 2011 inspection, please submit copies of all packing slips, shipping invoices, bills of lading, manifests (hazardous and non-hazardous), and LDR notices/certifications that accompanied the off-site shipment of each such material.
2. During EPA’s August 4, 2011 inspection containers seen in photos #28 and #29 were being stored outside next to the old batching building. Please answer the following;
- a. Identify the contents and volume of material in each container at the time of the inspection.
 - b. Provide the date on which these containers first began to accumulate at the Facility. If an exact date cannot be determined, please provide an estimated time period (month/year) of accumulation.
 - c. Provide a MSDS for each such material. If a MSDS is unavailable, please provide the manufacturer name and chemical name for each container.
 - d. Provide the manufacture date and lot number for each container.
 - e. Please provide a detailed narrative explaining how and when (month/year) the material in each of these containers will be used by Spray Products Corp.
 - f. State “yes” or “no” was a “waste determination” and “LDR determination” made for any of the materials in these containers at the time of the inspection?
 - g. If determined to be a waste, would any of the material be a “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with each such material.
 - h. Have any of these containers been shipped off-site since the EPA August 4, 2011 inspection, please submit copies of all packing slips, shipping invoices, bills of lading, manifests (hazardous and non-hazardous), and LDR notices/certifications that accompanied the off-site shipment of each such material.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
Name: _____
Title: _____

With regard to the Small Business Regulatory Enforcement and Fairness Act (SBREFA), please see the "Information for Small Businesses" memo, enclosed, which might be applicable to your company. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve you of your obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue this enforcement action. To preserve your legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action. EPA has not made a determination as to whether or not you [or your company] are covered by the SBREFA.

You are entitled to assert a claim of business confidentiality covering any part or all of the information, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Please send your response to:

Stephen Forostiak (3LC70)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

If you have any questions concerning this matter, please contact Mr. Forostiak at (215) 814-2136.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol Amend".

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Enclosures

cc: Stephen Forostiak (3LC70)
Terri DiFiore (3LC70)



PRODUCTS CORPORATION

Home Office: PO Box 737, Norristown, PA 19404
Phone 800 543-7710 FAX: 610 277-4390 www.sprayproducts.com

Headquarters

1323 Conshohocken Road
Plymouth Meeting, PA 19462

West Coast Warehouse:

5464 East Hedges Avenue
PO Box 7709
Fresno, CA 93747
800 962-5476
FAX: 559 252-5005

Mr. Stephen Forostiak (3LC70)

U.S. Environmental Protection Agency

Region III

1650 Arch Street

Philadelphia, PA 19103-2029

Re: Response to Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C 6927(a), Regarding Generation and Management of Hazardous Waste by Spray Products Inc. Reference # C12-003

Dear Mr. Forostiak,

In response to the request for determination on containers stored at 1323 Conshohocken rd, Plymouth Meeting, PA 19462, Inspected on August 4, 2011, we offer this identification.

- 1) In reference to photos #20 thru #27 stored in storage area 01 (picture # 01)
 - A) Contents and volume of material in area applied to inventory;
 - TS -15 252 lbs back into inventory
 - ALOX 22130 370 lbs back into inventory
 - Kerosene 116 lbs back into inventory
 - Cross Road Paint 1-6-3230 SP#015-752 800 lbs back into inventory
 - DuPont 818P31854 SP#015-227 80 lbs back into inventory
 - Mil Spec Paint (GREEN) SP#015-10342 550 lbs back into inventory
 - NPB SP#007-006 582 lbs back into inventory

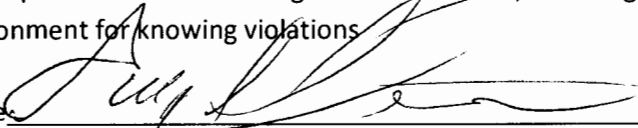
Bel-Ray Super Clean Completed Mix LOT#PF243410509 337 lbs back into inventory
Bel-Ray Super Tac Concentrate LOT#PF305920910 SP#900-5407 360 lbs back into inventory
Chem Tool Red Grease SP#011-013 240 lbs back into inventory
Total drums consolidated and re-entered to inventory 24

- B) These 24 containers were brought to the Plymouth Meeting location on or about August, 2010, being in the usable inventory at the Upland Facility.
 - C) MSDS SHEETS ARE ATTACHED
 - D) This information is not available on all material
 - E) All Material Re-entered into the inventory will be consumed on the next customer run
 - F) Due to the custom applications, and sometimes limited quantities requested by the customer, consumption and run date are not something we can provide or commit to at this time.
 - G) 24 Containers in storage area 01 were determined un-salvageable due to contamination; this material was entered into the standard waste stream at Spray Products Inc.
 - H) All material in these 26 drums were determined as hazardous waste and labeled under Waste code D001
 - I) MANIFEST COPY IS ATTACHED
- 2) In reference to pictures #28 and #29, There were 13 drums stored in this area, 9 containers were put back into the inventory
- A) Contents and volume of material in area applied to inventory;
 - Aquaslip™ SP#011-337 1,138 lbs back into inventory
 - Gastasorb SP#008-098 381 lbs back into inventory
 - PMX-200-1000cs SP#008-062 129 lbs back into inventory
 - IPA 99% SP#007-028 117 lbs back into inventory
 - Hunter Green 40F4 SP-914 353 lbs back into inventory
 - Hunter Green 30F4 SP-914 352 lbs back into inventory
 - ORR-LAC UNIVERSAL GRAY SP-962 447 lbs back into inventory
 - ORR-LAC BFI Blue SP-927 223 lbs back into inventory
 - Multi-use Lacquer Thinner 427 lbs back into inventory
 - B) These 9 containers were brought to the Plymouth Meeting location on or about August, 2010, being in the usable inventory at the Upland Facility.
 - C) MSDS SHEETS ARE ATTACHED
 - D) This information is not available on all material
 - E) All Material Re-entered into the inventory will be consumed on the next customer run

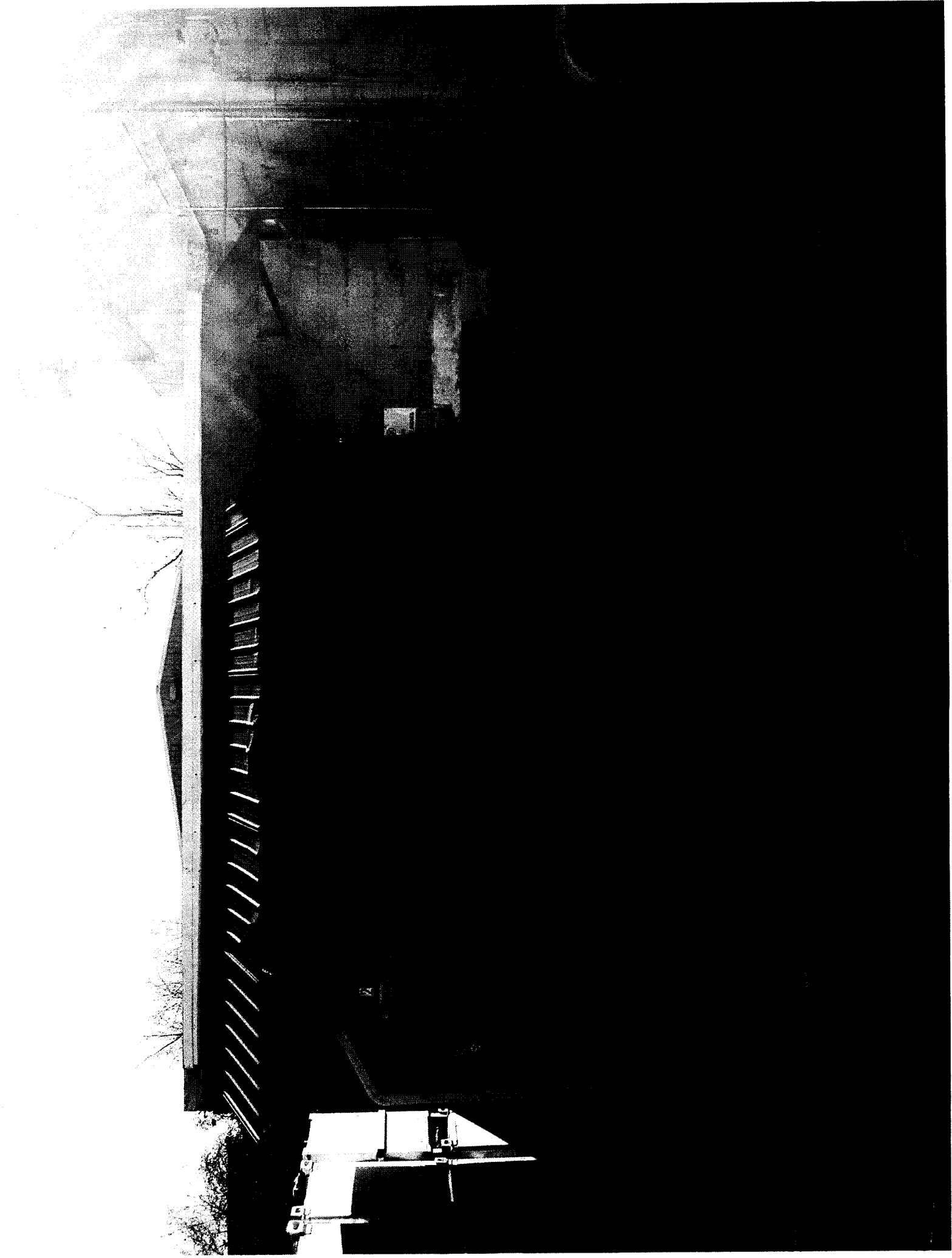
- F) Due to the custom applications, and sometimes limited quantities requested by the customer, consumption and run date are not something we can provide or commit to at this time.
- G) 4 Containers in this area were determined un-salvageable due to contamination; this material was entered into the standard waste stream at Spray Products Inc.
- H) All material in these 4 drums were determined as hazardous waste and labeled under Waste code D001
- I) MANIFEST COPY IS ATTACHED

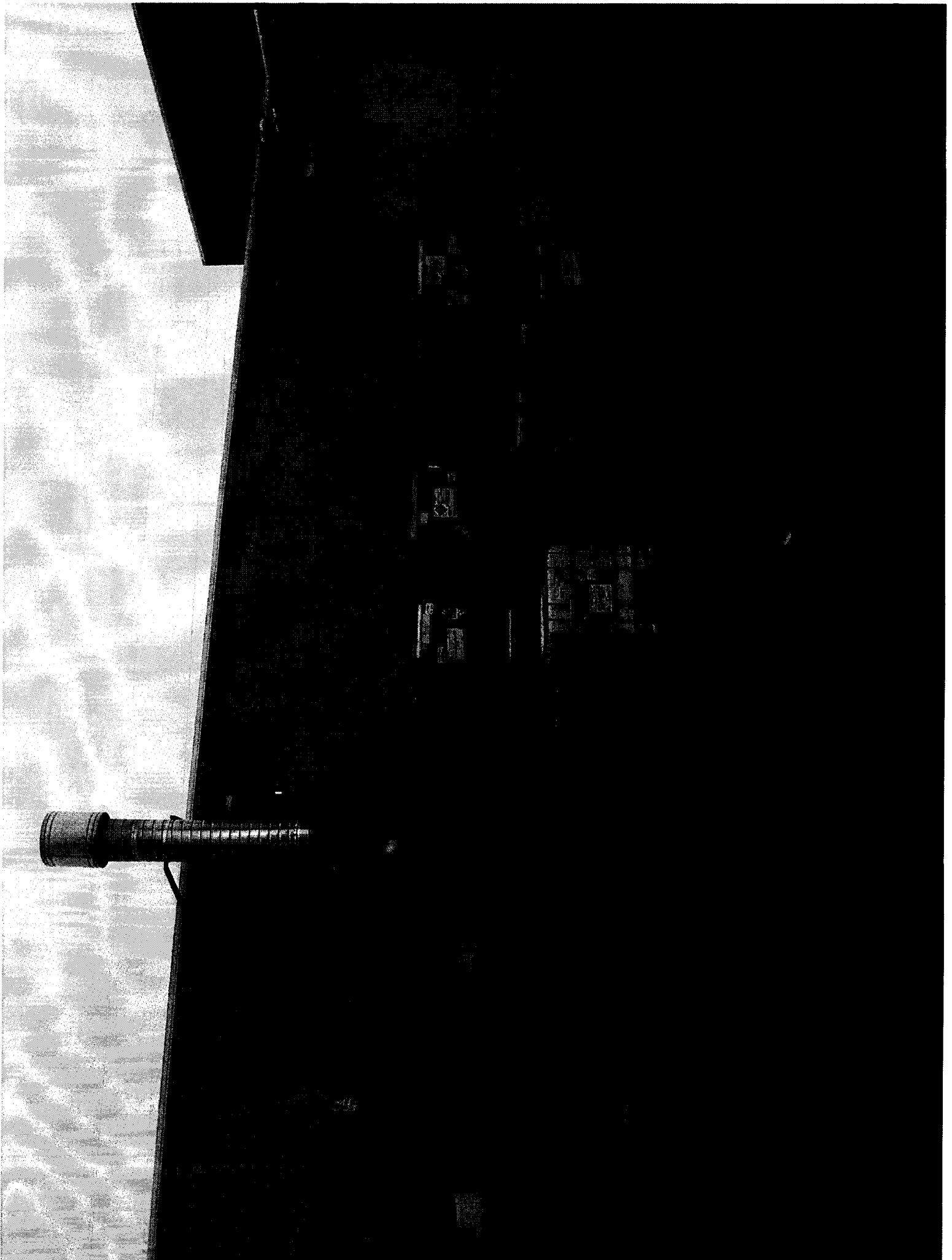
Any further information you may need from Spray Products please do not hesitate to contact me at 610-633-1417

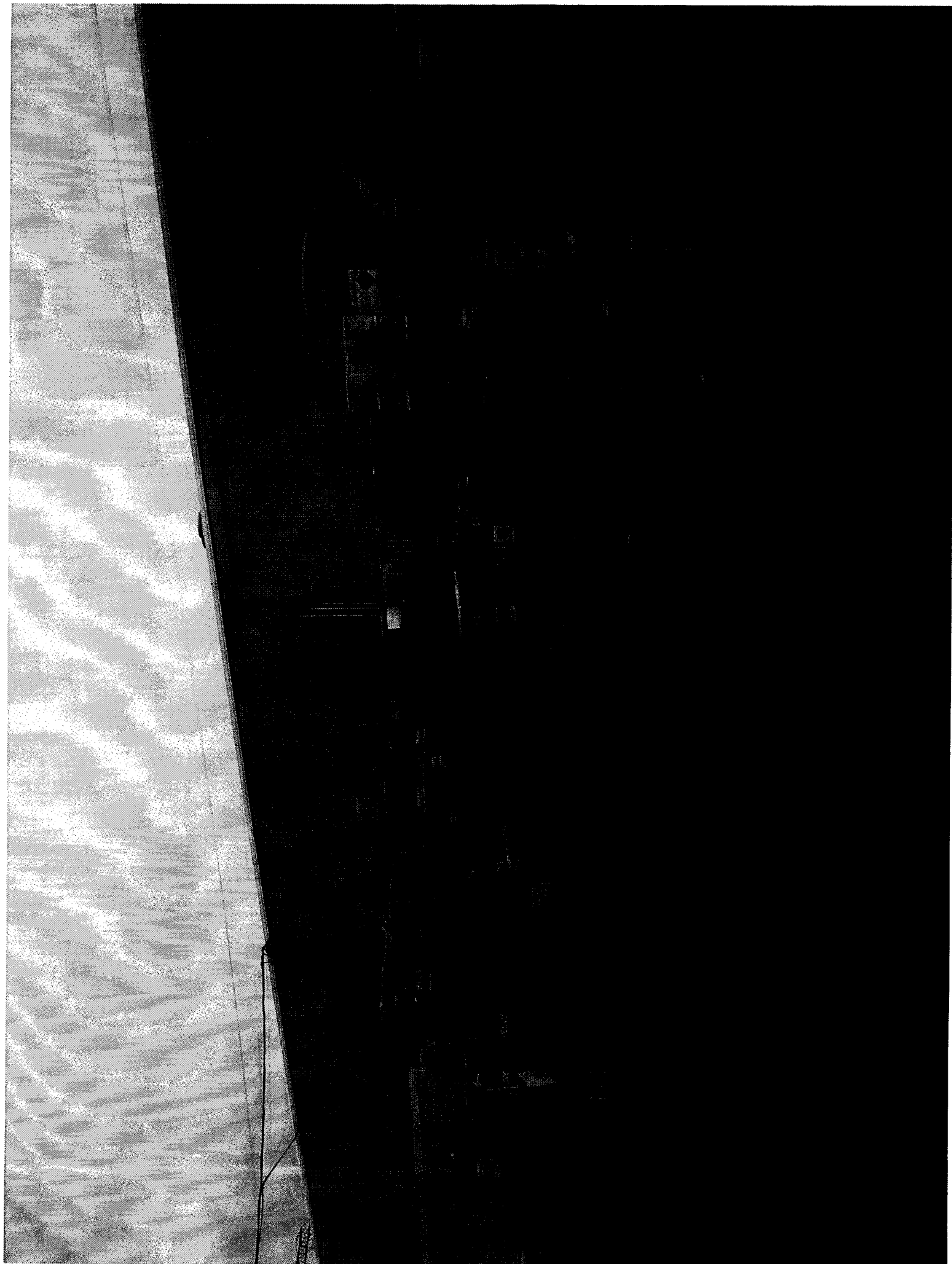
I certify that the information contained in this response to the EPS's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

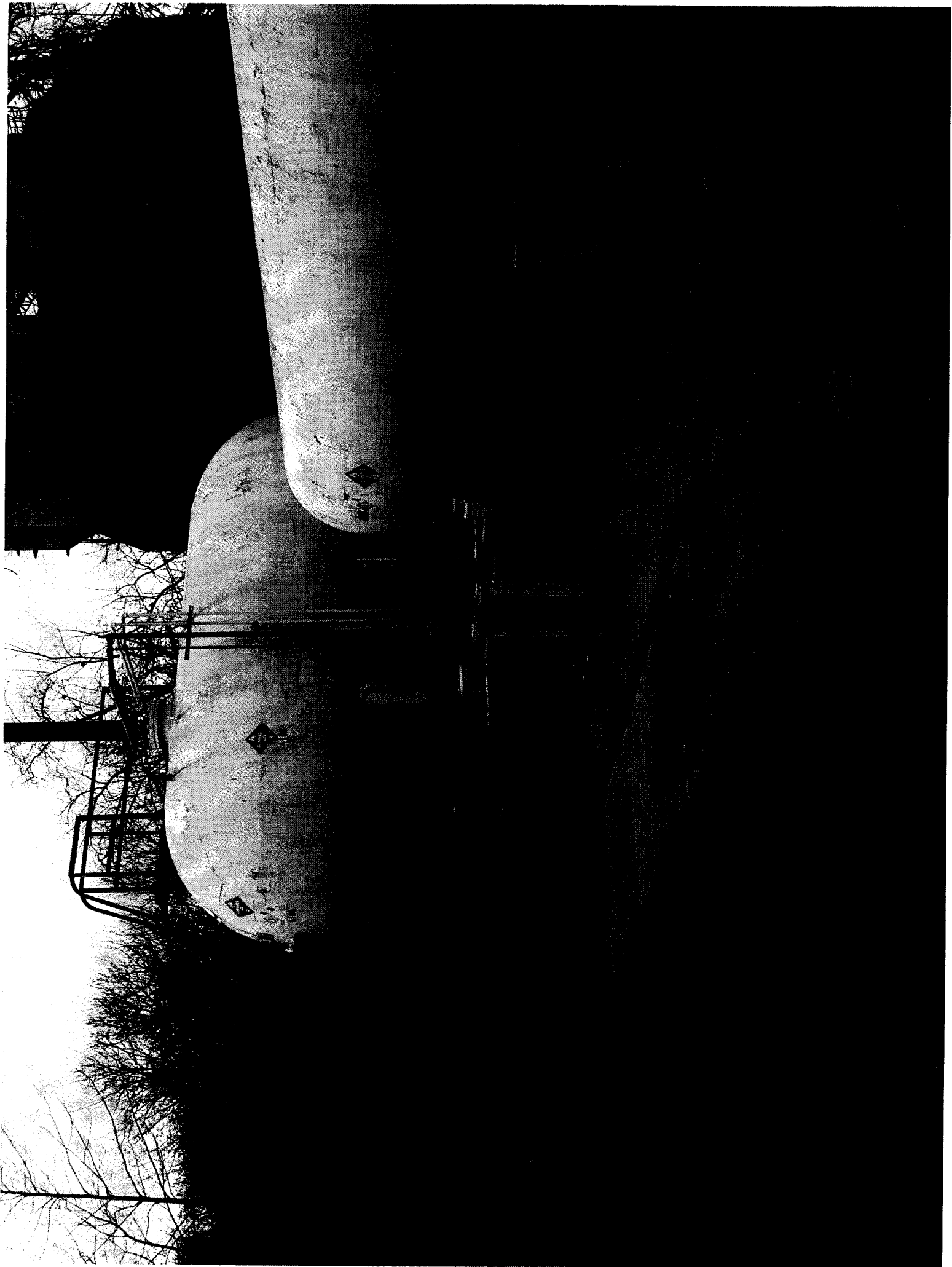
Signature 
Name Guy Tardieu
Title Plant Engineer

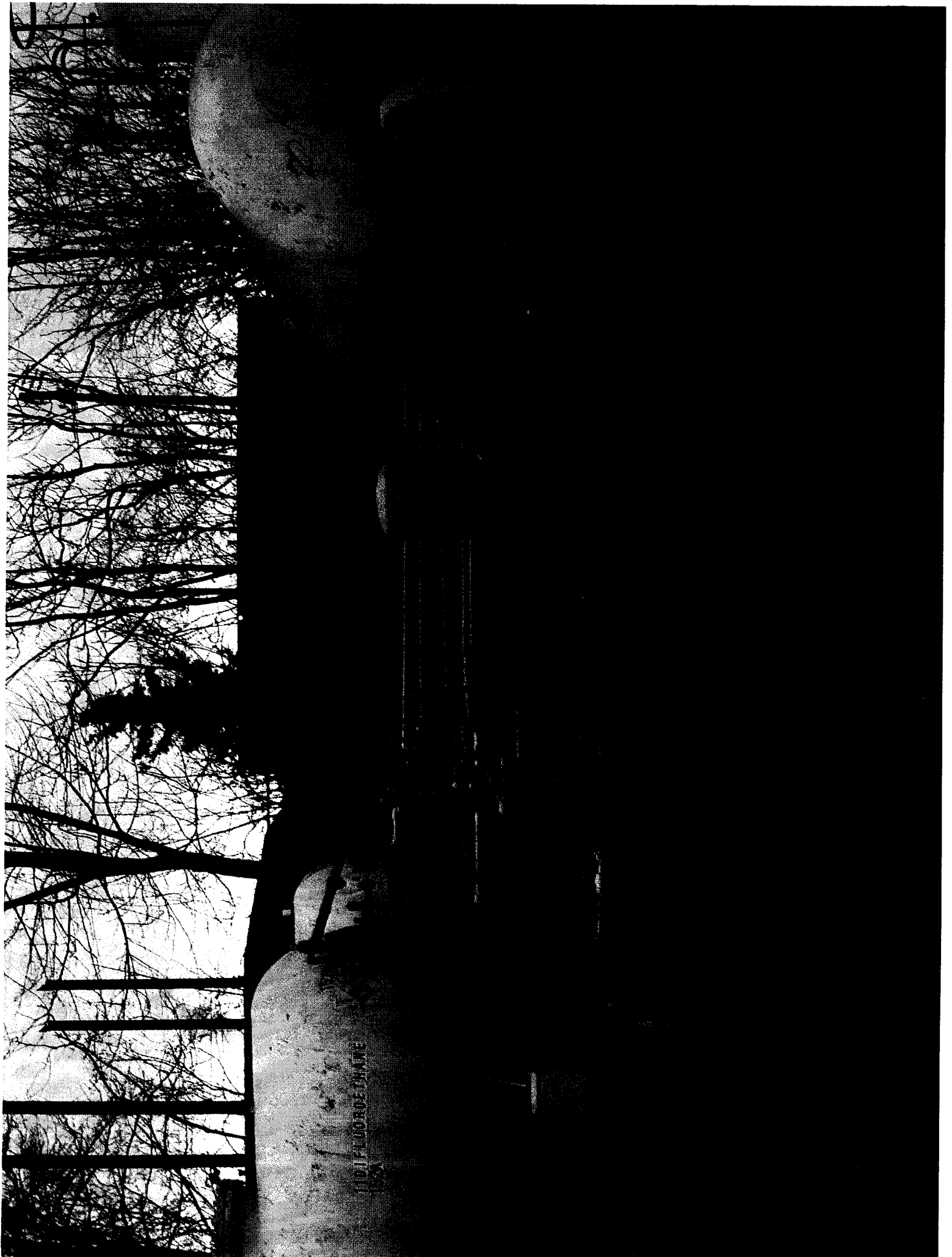


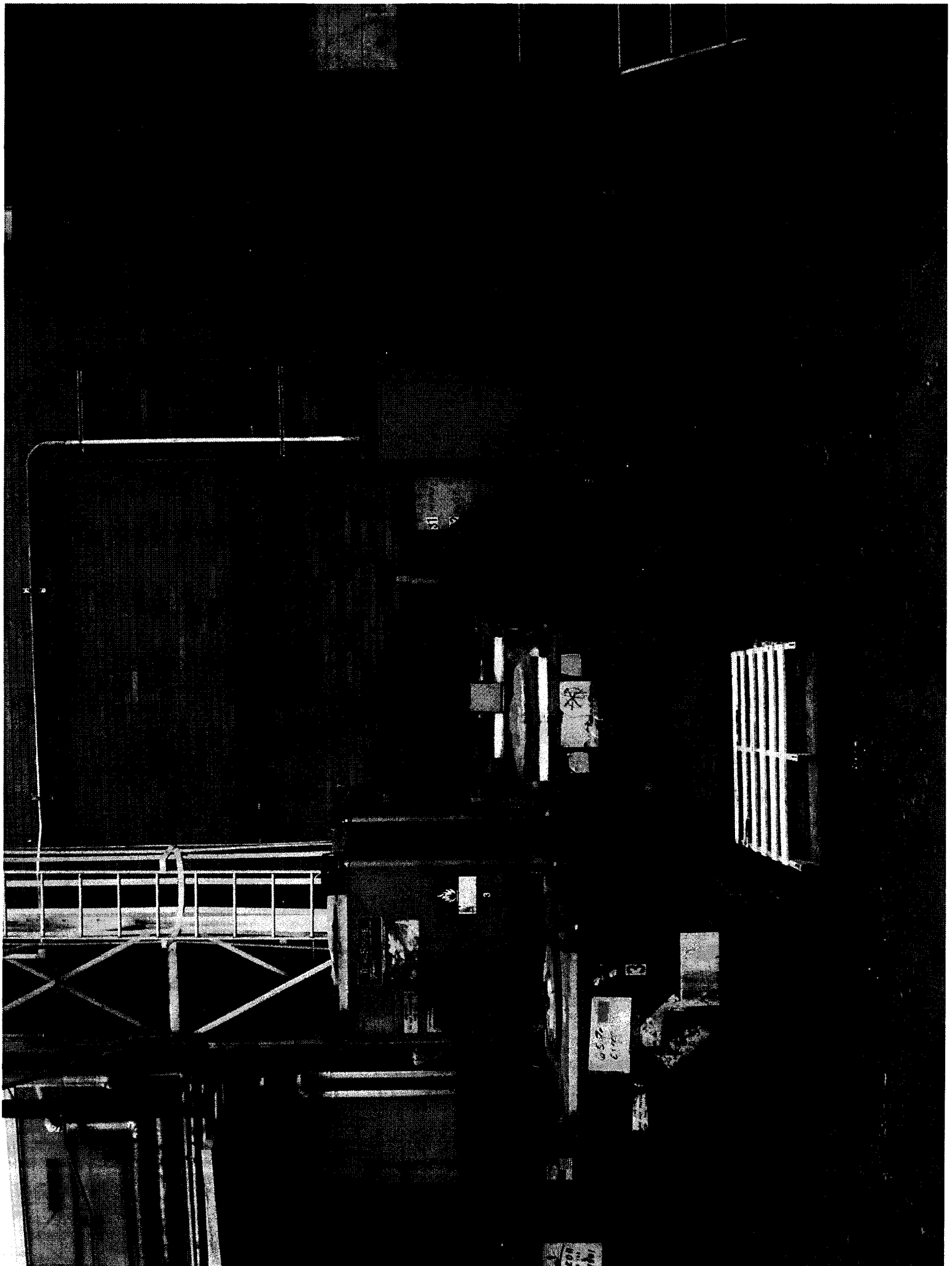


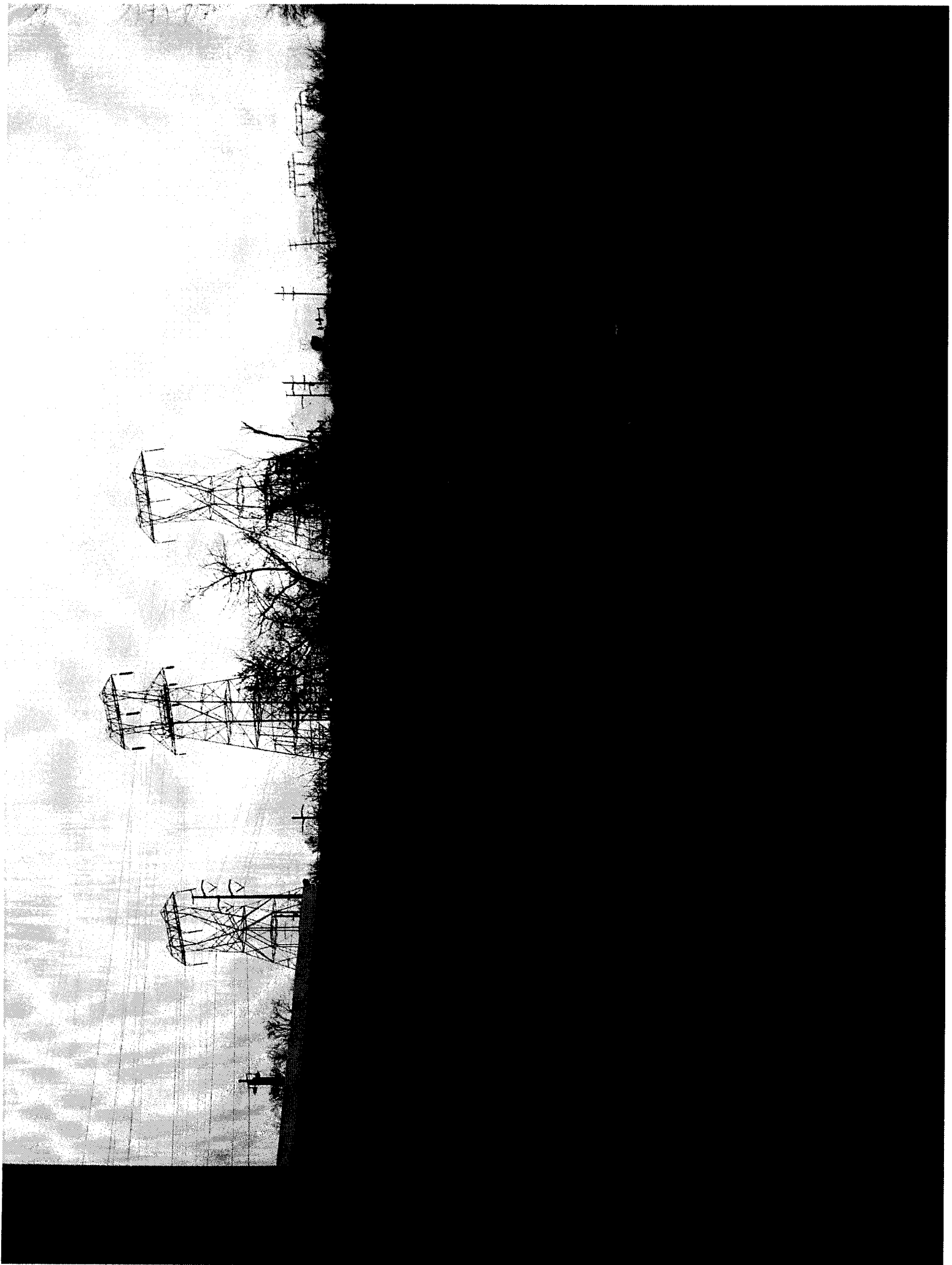


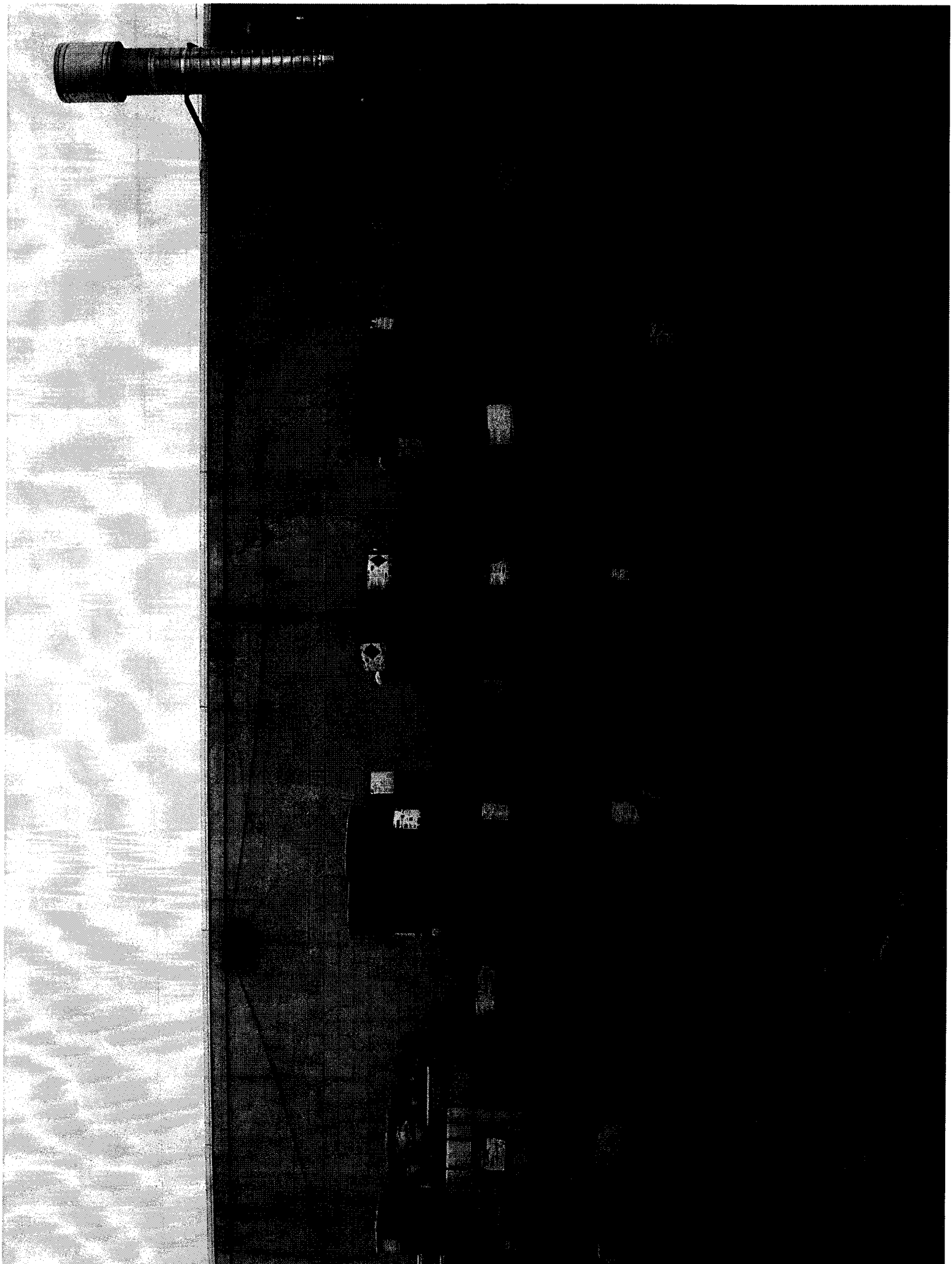












**Material Safety Data Sheet**
AQUASLIP(TM) 952, 011-337

Prepared according to 29CFR 1910.1200.

1	Chemical Product and Company Identification
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THE LUBRIZOL CORPORATION
9921 BRECKSVILLE RD
BRECKSVILLE, OH 44141

Product Trade Name AQUASLIP(TM) 952, 011-337
CAS Number Not applicable for mixtures.
Synonyms None.
Generic Chemical Name Mixture.
Product Type Wax Emulsions
Preparation/Revision Date 26 January 2010
Transportation Emergency Phone No. FOR TRANSPORT EMERGENCY call CHEMTREC: (+1) 703-527-3887 (outside the U.S.), 1-800-424-9300 (in the U.S.)
MSDS No. 29567868-8822221-402011-102103

2	Hazards Identification
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Appearance Translucent liquid.
Odor Mild
Principal Hazards Warning.

- Harmful if inhaled.
- Harmful if absorbed through skin.
- Component(s) known to cause chronic human health effects.
- May cause eye irritation.
- May cause skin irritation.

Target Organs: Blood Central nervous system Kidney Liver

See Section 11 for complete health hazard information.

3	Composition/Information on Ingredients
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Hazardous Ingredients

Comp	CAS No.	Percentage (by wt.)	Carcinogen
Butyl cellosolve	111-76-2	From 1 to 4.9 percent	N/E

(N/E) - None established

4	First Aid Measures
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Eyes Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists, get medical attention.

Skin Wash immediately with soap and water. Immediately remove contaminated clothing. Get medical attention if irritation develops. Launder contaminated clothing before reuse.

Inhalation Remove exposed person to fresh air if adverse effects are observed.

Oral Treat symptomatically. Get medical attention.

Additional Information Get medical attention advice if you feel unwell.

5	Fire Fighting Measures
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Flash Point > 100 °C, 212 °F PMCC (Minimum)

Extinguishing Media CO2, dry chemical, foam, water spray, water fog.

Firefighting Procedures Wear full protective firegear including self-containing breathing apparatus operated in the positive pressure mode with full facepiece, coat, pants, gloves and boots. Water may be ineffective fighting fires. Use water to cool containers exposed to fire.

Unusual Fire & Explosion Hazards Material will not burn until water has been evaporated. Container may rupture on heating.

6	Accidental Release Measures
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Spill Procedures Personal Protective Equipment must be worn, see Personal Protection Section for PPE recommendations. Ventilate area if spilled in confined space or other poorly ventilated areas. Prevent entry into sewers and waterways. Spilled liquid and dried film are slippery. Use care to avoid falls. Pick up free liquid for recycle and/or disposal. Residual liquid can be absorbed on inert material. Wash spill area with soap and water.

7	Handling and Storage
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Pumping Temperature Not determined.

Maximum Handling Temperature Not determined.

Handling Procedures Open container in a well ventilated area. Avoid breathing vapors. Keep containers closed when not in use. Avoid eye contact. Avoid repeated or prolonged skin contact. Avoid drinking, tasting, swallowing or ingesting this product. Avoid breathing dust, fume, gas, mist, vapors or spray. Minimize contact with air to reduce contamination with mold, fungus, or other organisms which could cause decomposition or spoilage. Wash thoroughly after handling. Empty container contains product residue which may exhibit hazards of product.

Maximum Storage Temperature Not determined.

Storage Procedures Keep from freezing. Keep container closed when not in use. Do not store in open, unlabeled or mislabeled containers.

Loading Temperature Not determined.

8	Exposure Controls/Personal Protection
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Exposure Limits

Comp	Exposure Guidelines					
	OSHA		ACGIH		Other	
	TWA	STEL	TWA	STEL	TWA	STEL
Butyl cellosolve	50 ppm (s)	N/E	20 ppm	N/E	20 ppm (u)	N/E

(s) - Skin exposure

(p) - Proposed limit

(c) - Ceiling exposure

(l) - Recommended exposure limit

(u) - Supplier recommended exposure limit

(N/E) - None established

Other Exposure Limits None known.

Engineering Controls Use local exhaust ventilation to control mists or vapors. Additional ventilation or exhaust may be required to maintain air concentrations below recommended exposure limits.

Gloves Procedures Use good industrial hygiene practices to avoid skin contact. If contact with the material may occur wear chemically protective gloves.

Eye Protection Safety Glasses.

Respiratory Protection Use NIOSH/MSHA approved full face respirator with a combination organic vapor and dust/mist cartridge if the recommended exposure limit is exceeded. Use self-contained breathing apparatus for entry into confined space, for other poorly ventilated areas and for large spill clean-up sites.

Clothing Recommendation Gloves, coveralls, apron, boots as necessary to minimize contact. Use nitrile rubber boots when necessary to avoid contaminating shoes. Do not wear

rings, watches or similar apparel that could entrap the material and cause a skin reaction.

9	Physical and Chemical Properties
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Flash Point	> 100 °C, 212 °F PMCC (Minimum)
Upper Flammable Limit	Not determined.
Lower Flammable Limit	Not determined.
Autoignition Point	Not determined.
Explosion Data	Material does not have explosive properties.
Vapor Pressure	< 17.5 mm Hg (20 °C)
pH	9 - 10
Specific Gravity	1.07 (20 °C)
Bulk Density	Not determined.
Water Solubility	Soluble.
Percent Solid	25% By Weight
Percent Volatile	74.5 - 75.5% By Weight
Volatile Organic Compound	< 2.4% By Weight
Vapor Density	< 1 Air=1
Evaporation Rate	< 1 Butyl acetate=1
Odor	Mild
Appearance	Translucent liquid.
Viscosity	12.5 Centipoise (25 °C)
Odor Threshold	Not determined.
Boiling Point	~ 100 °C, ~ 212 °F(Typical)
Pour Point	Not determined.
Temperature	
Melting / Freezing Point	~ 0 °C, ~ 32 °F

*The above data are typical values and do not constitute a specification.
Vapor pressure data are calculated unless otherwise noted.*

10	Stability and Reactivity
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Stability	Material is normally stable at moderately elevated temperatures and pressures.
Decomposition	Not determined.

Temperature**Incompatibility**

Alkalis. Strong oxidizing agents.

Polymerization

Will not occur.

Thermal**Decomposition**

Smoke, carbon monoxide, carbon dioxide, aldehydes and other products of incomplete combustion. Irritating and toxic substances may be emitted upon combustion, burning, or decomposition of dry solids.

Conditions to Avoid

Do not freeze.

11	Toxicological Information
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-- ACUTE EXPOSURE --**Eye Irritation**

Weak to moderate eye irritant. Does not meet EU R36 criteria. Based on data from similar materials. Vapors formed from heating may cause eye irritation.

Skin Irritation

May cause mild skin irritation. Does not meet Canadian D2B or EU R38 criteria. Based on data from similar materials. Prolonged or repeated skin contact as from clothing wet with material may cause dermatitis. Symptoms may include redness, edema, drying, and cracking of the skin.

Respiratory Irritation

If material is misted or if vapors are generated from heating, exposure may cause irritation of mucous membranes and the upper respiratory tract. Based on data from similar materials.

Dermal Toxicity

The LD50 in rabbits is > 2000 mg/Kg. Based on data from components or similar materials. Skin absorption of components of this material may cause systemic effects; note toxicity from other sections.

Inhalation Toxicity

The LC50 (1 hr.) in rats for vapors of this material is > 200 mg/l. Based on data from components or similar materials. High concentrations may cause headaches, dizziness, weakness, irritability and other behavioral changes, nausea, and vomiting.

Comp	Percentage (by wt.)	LC50 (4 Hr.)	Form
Butyl cellosolve	From 1 to 4.9 percent	2 - 20mg/l	Vapor

Oral Toxicity

The LD50 in rats is > 10,000 mg/Kg. Based on data from components or similar materials. Ingestion of this material may cause headache, dizziness, uncoordination, and general weakness. Ingestion may cause red blood cell hemolysis and possible liver and kidney injury.

Dermal Sensitization

No data available to indicate product or components may be a skin sensitizer.

Inhalation Sensitization

No data available to indicate product or components may be respiratory sensitizers.

-- CHRONIC EXPOSURE --**Chronic Toxicity**

Repeated overexposure to butyl cellosolve may cause hemolysis of the red blood cells leading to possible liver and kidney damage.

Carcinogenicity

The National Toxicology Program (NTP) completed a two year inhalation

chronic toxicity/carcinogenicity study that indicated butyl cellosolve has some evidence of carcinogenic activity in male and female mice, equivocal evidence in female rats and no evidence in male rats. The relevance of this data to human workplace exposure has not been established.

Mutagenicity	Results of in-vivo mutagenicity tests for butyl cellosolve have been negative. Results of in-vitro mutagenicity tests have been inconclusive.
Reproductive Toxicity	No data available to indicate either product or components present at greater than 0.1% that may cause reproductive toxicity.
Teratogenicity	No data available to indicate product or any components contained at greater than 0.1% may cause birth defects.

-- ADDITIONAL INFORMATION --

Other	Pre-existing skin conditions may be aggravated by prolonged or repeated exposure.
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12	Ecological Information
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-- ENVIRONMENTAL TOXICITY --

Freshwater Fish Toxicity	Not determined.
Freshwater Invertebrates Toxicity	Not determined.
Algal Inhibition	Not determined.
Saltwater Fish Toxicity	Not determined.
Saltwater Invertebrates Toxicity	Not determined.
Bacteria Toxicity	Not determined.
Miscellaneous Toxicity	Not determined.

-- ENVIRONMENTAL FATE --

Biodegradation	Adequate data is not available to estimate the biodegradation potential of this material.
Bioaccumulation	25% or greater of the components display no potential to bioconcentrate.
Soil Mobility	Not determined.

13	Disposal Considerations
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Waste Disposal	This material, if discarded, is not a hazardous waste under RCRA Regulation 40 CFR 261. Treatment, storage, transportation, and disposal must be in accordance with applicable Federal, State/Provincial, and Local regulations.
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14	Transport Information
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ICAO/IATA I	Not regulated.
ICAO/IATA II	Not regulated.
IMDG	Not regulated.
IMDG EMS Fire	Not applicable.
IMDG EMS Spill	Not applicable.
IMDG MFAG	Not applicable.
MARPOL Annex II	Not determined.
USCG Compatibility	Not determined.
U.S. DOT Bulk	Not regulated.
DOT NAERG	Not applicable.
U.S. DOT (Intermediate)	Not regulated.
U.S. DOT Intermediate NAERG	Not applicable.
U.S. DOT Non-Bulk	Not regulated.
U.S. DOT Non-Bulk NAERG	Not applicable.
Canada	Not regulated.
Mexico	Not regulated.
Bulk Quantity	85000 KG, 187391 lbs.
Intermediate Quantity	11000 KG, 24251 lbs.
Non-Bulk Quantity	400 KG, 882 lbs.

Review classification requirements before shipping materials at elevated temperatures.

15	Regulatory Information
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-- Global Chemical Inventories --

USA	All components of this material are on the US TSCA Inventory or are exempt.
Other TSCA Reg.	None known.
EU	All components are in compliance with the EC Seventh amendment Directive 92 /32/EEC.
Japan	All components are in compliance with the Chemical Substances Control Law of Japan.
Australia	This product requires notification before sale in Australia.

New Zealand	May require notification before sale under New Zealand regulations.
Canada	All components are in compliance with the Canadian Environmental Protection Act and are present on the Domestic Substances List.
Switzerland	All components are in compliance with the Environmentally Hazardous Substances Ordinance in Switzerland.
Korea	All components are in compliance in Korea.
Philippines	All components are in compliance with the Philippines Toxic Substances and Hazardous and Nuclear Wastes Control Act of 1990 (R.A. 6969).
China	All components of this product are listed on the Inventory of Existing Chemical Substances in China.

-- Other U.S. Federal Regulations --

SARA Ext. Haz. Subst. This product does not contain greater than 1.0% of any chemical substance on the SARA Extremely Hazardous Substances list.

SARA Section 313 2.4 % Glycol ether

SARA 311

Classifications

Acute Hazard	Yes
Chronic Hazard	Yes
Fire Hazard	No
Reactivity Hazard	No

CERCLA Hazardous Substances

None known.

FDA Approval

Not applicable.

-- State Regulations --

Cal. Prop. 65 This product contains chemicals(s) known to the state of California to cause cancer and/or birth defects. Call 440-943-4200 for additional information.

-- Product Registrations --

U.S. Fuel Registration Not applicable.

U.S. Dept of Agriculture

This product has not been filed with the USDA to support H2 approvals.

NSF Nonfood Compounds Registration

This product has not been filed with the NSF to support H1 or H2 approvals.

Finnish Registration Number

Not Registered

Swedish Registration Number

Not Registered

Norwegian Registration Number

Not Registered

Danish Registration Number

Not Registered

Swiss Registration

Not Registered

Number**Italian Registration
Number**

Not Registered

**Korean Registration
Number**

This product is registered in Korea with the Ministry of the Environment.

-- Other / International --

16	Other Information
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US NFPA Codes

Health	Fire	Reactivity	Special
1	1	0	N/E

(N/E) - None established

HMIS Codes

Health	Fire	Reactivity
1*	1	0

Precautionary Labels

Warning.

- Harmful if inhaled.
- Harmful if absorbed through skin.
- Component(s) known to cause chronic human health effects.
- May cause eye irritation.
- May cause skin irritation.

Revision Indicators

Section: 1 Product type.	Changed: 29 March 2009
Section: 2 Principal hazards.	Changed: 31 March 2009
Section: 2 Target organs.	Changed: 29 March 2009
Section: 4 Additional first aid measures.	Changed: 29 March 2009
Section: 4 Inhalation first aid.	Changed: 4 August 2009
Section: 4 Oral first aid.	Changed: 26 January 2010
Section: 4 Skin first aid.	Changed: 29 March 2009
Section: 5 Extinguishing media.	Changed: 14 October 2009
Section: 5 Flash point.	Changed: 26 January 2010
Section: 5 Flash point.	Changed: 26 January 2010
	Changed: 14 October

Section: 5 Special firefighting procedures.	2009
Section: 5 Unusual fire& explosion hazards.	Changed: 26 January 2010
Section: 7 Handling procedures.	Changed: 26 June 2009
Section: 8 Clothing recommendations.	Changed: 26 January 2010
Section: 8 Glove protection.	Changed: 26 January 2010
Section: 9 Evaporation rate.	Changed: 26 January 2010
Section: 9 Flash point.	Changed: 26 January 2010
Section: 9 Flash point.	Changed: 26 January 2010
Section: 9 Freezing point.	Changed: 26 January 2010
Section: 9 Odor threshold.	Changed: 29 March 2009
Section: 9 Percent solid.	Changed: 26 January 2010
Section: 9 Percent volatile.	Changed: 26 January 2010
Section: 9 Vapor density.	Changed: 26 January 2010
Section: 10 Conditions to avoid.	Changed: 26 January 2010
Section: 10 Incompatibility.	Changed: 26 January 2010
Section: 11 Eye irritation.	Changed: 14 October 2009
Section: 11 Inhalation toxicity.	Changed: 4 August 2009
Section: 11 Oral toxicity.	Changed: 26 June 2009
Section: 11 Other.	Changed: 14 October 2009
Section: 11 Teratogenicity.	Changed: 29 March 2009
Section: 14 U.S. DOT Intermediate shipping description.	Changed: 14 October 2009
Section: 15 NSF Nonfood Compounds Registration	Changed: 14 October 2009
Section: 15 Other TSCA regulations.	Changed: 11 May 2009
Section: 16 HMIS codes.	Changed: 29 March

Section: 16 NFPA Codes.

2009

Changed: 29 March
2009

Section: 16 Principal hazards.

Changed: 31 March
2009

As the conditions or methods of use are beyond our control, we do not assume any responsibility and expressly disclaim any liability for any use of this product. Information contained herein is believed to be true and accurate but all statements or suggestions are made without warranty, expressed or implied, regarding accuracy of the information, the hazards connected with the use of the material or the results to be obtained from the use thereof. Compliance with all applicable federal, state, and local regulations remains the responsibility of the user.

MATERIAL SAFETY DATA SHEET

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PRODUCT NAME : GASTASORB 80

PRODUCT DESCRIPTION: SORBITAN MONOOLEATE
 CAS NO. 1338-43-8

*****SECTION I - MANUFACTURER IDENTIFICATION*****

DISTRIBUTED BY: FCI TECHNOLOGY, INC
ADDRESS : 230 AIRWAYS DR. BESSEMER CITY, NC 28016

HMS	LEAST	SLIGHT	MODERATE	HIGH	EXTREME
SCALE	0	1	2	3	4
HEALTH	0				
FIRE		1			
REACTIVITY	0				
PROTECTION	B				

EMERGENCY TEL : 704-629-4630 PRINT DATE : 4/30/2008
INFORM. TEL. : 704-629-4630 PREPARED BY : MIKE FLANIGAN

*****SECTION II - HAZARDOUS INGREDIENTS / SARA III INFORMATION*****

REPORTABLE COMPONENTS CAS NUMBER WT. PERCENT
NON-REGULATED MATERIAL

No toxic chemical(s) subject to the reporting requirements of section 313 and 40 CFR 372 are present

***** SECTION III - PHYSICAL / CHEMICAL CHARACTERISTICS *****

BOILING POINT : > 100 C SPECIFIC GRAVITY (H2O=1) : < 1
VAPOR DENSITY : N.K. EVAPORATION RATE : N.K.
SOLUBILITY IN WATER : INSOLUBLE % VOLATILES(AS WATER): 1%
APPEARANCE AND ODOR : LIQUID % VOLATILES(AS ORGANICS): 0%

***** SECTION IV - FIRE AND EXPLOSION HAZARD DATA *****

FLASH POINT : > 300 F METHOD USED :
FLAMMABLE LIMITS IN AIR BY VOL. LOWER : N.K. UPPER : N.K.

EXTINGUISHING MEDIA:
CARBON DIOXIDE, WATER SPRAY, FOAM OR DRY CHEMICAL

SPECIAL FIREFIGHTING PROCEDURES:
USE SELF CONTAINED BREATHING APPARATUS AND FULL PROTECTIVE CLOTHING

UNUSUAL FIRE AND EXPLOSION HAZARDS:
COULD GIVE OFF CARBON MONOXIDE FUMES UNDER FIRE CONDITIONS

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PROD : GASTASORB 80

*** SECTION V - REACTIVITY DATA ***

STABILITY : STABLE
CONDITIONS TO AVOID:
OPEN FLAME, EXTREMELY HIGH TEMPERATURE

INCOMPATIBILITY (MATERIALS TO AVOID):
NONE

HAZARDOUS DECOMPOSITION OR BY PRODUCTS:
THERMAL DECOMPOSITION MAY GENERATE CARBON MONOXIDE AND CARBON DIOXIDE.

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

*** SECTION VI - HEALTH HAZARD DATA ***

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE:
CONSULT PHYSICIAN IF IRRITATION OF RESPIRATORY PASSAGES OCCURS.

SKIN AND EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE:
HOLD EYELIDS OPEN AND FLUSH EYES FOR AT LEAST 15 MINUTES WITH LARGE QUANTITIES OF WATER. SEEK MEDICAL ATTENTION IMMEDIATELY.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE:
REMOVE CONTAMINATED CLOTHING. WASH AFFECTED AREA WITH SOAP AND PLENTY OF WATER.
CONSULT PHYSICIAN IF IRRITATION CONTINUES.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE:
CONSULT PHYSICIAN.

ADDITIONAL MEASURES:
IF OVEREXPOSURE OR DIFFICULTY IN BREATHING OCCURS, REMOVE VICTIM TO FRESH AIR.
RESTORE BREATHING IF NECESSARY. SEEK MEDICAL HELP.

HEALTH HAZARDS (ACUTE AND CHRONIC)

CARCINOGENICITY	NTP carcinogen :	NO	OSHA :	NO
	IARC monographs :	NO		

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: N.K.

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PROD : GASTASORB 80

*** SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE ***

RELEASE OR SPILL CONTROL:

WEARING APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT, CONTAIN SPILL, COLLECT ONTO INERT ABSORBENT AND PLACE IN SUITABLE CONTAINER.

WASTE DISPOSAL METHOD:

DISPOSE OF IN ACCORDANCE WITH FEDERAL, STATE, AND LOCAL REGULATIONS.

HANDLING AND STORAGE:

DO NOT STORE ABOVE 120 F.

OTHER PRECAUTIONS:

*** SECTION VIII - CONTROL MEASURES ***

RESPIRATORY PROTECTION:

IF AIRBORNE CONCENTRATIONS POSE A HEALTH HAZARD, BECOME IRRITATING, OR EXCEED RECOMMENDED LIMITS, USE A NIOSH APPROVED RESPIRATOR IN ACCORDANCE WITH OSHA PROTECTION REQUIREMENTS UNDER 29 CFR 1910.134.

VENTILATION:

ALWAYS USE IN WELL VENTILATED AREAS WITH IMMEDIATE 100% AIR TURNOVER.

PROTECTIVE GLOVES:

WEAR RUBBER GLOVES AND LONG SLEEVES WHILE WORKING WITH: GASTASORB 80

EYE PROTECTION:

WEAR SIDE SHIELD SAFETY GLASSES WHILE WORKING WITH: GASTASORB 80

OTHER PROTECTIVE CLOTHING OR EQUIPMENT:

YOU CANNOT WEAR "TOO MUCH" PERSONAL SAFETY PROTECTION WHEN WORKING WITH ANY CHEMICALS.

WORK/HYGIENIC PRACTICES:

ALWAYS WASH HANDS AND POTENTIALLY EXPOSED BODY PARTS WITH SOAP AND WATER BEFORE LEAVING THE WORK AREA, AND CERTAINLY BEFORE EATING.

*** SECTION IX - DISCLAIMER ***

RESPONSIBILITY IS ASSUMED ONLY FOR THE FACT THAT ALL STUDIES REPORTED HERE AND ALL OPINIONS ARE THOSE OF QUALIFIED EXPERTS. THE DATA RELATES ONLY TO THE MATERIAL AS SUPPLIED AND DOES NOT RELATE TO COMBINATIONS WITH OTHER MATERIALS OR PROCESSES.